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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH
NORTHERN DIVISION**

**JM4 TACTICAL, LLC; and JAMES
CHADWICK MYERS,**

Plaintiffs,

versus

**E & R LLC d/b/a HER TACTICAL;
*et. al.***

Defendants.

**JOINT SUBMISSION OF CLAIM TERMS
FOR CONSTRUCTION**

LPR 4.2(b)

Case No. 1:22-cv-01121-DAK-DBP

Judge Dale A. Kimball
Magistrate Judge Dustin B. Pead

Jury Demanded

TO THE HONORABLE COURT:

Pursuant to Local Patent Rule 4.1(b) [now 4.2(b)], the parties have met and conferred regarding claim terms and phrases for the Court to construe. The parties were unable to agree on ten terms for construction. Accordingly, pursuant to LPR 4.2(b), five terms are allocated collectively to all plaintiffs and five terms are allocated collectively to all defendants.

I. Terms Allocated to Plaintiffs

Claim Terms and Phrases for the Court to Construe	Plaintiff's Proposed Constructions	Defendants' Proposed Construction	35 U.S.C. § 112(f) Elements
<i>fastener protrusion</i>	A component that secures one object to another and extends beyond a surface	Plain ordinary meaning	N/A
<i>fastener housing</i>	A structure that contains or surrounds a fastening mechanism	Plain ordinary meaning	N/A
<i>disposed within a thickness</i>	Positioned inside the depth dimension of a material or structure	Plain ordinary meaning	N/A
<i>two magnets</i>	Two magnetic elements that work together	Plain ordinary meaning	N/A
<i>integrally secured</i>	Permanently attached to form a unified whole	Plain ordinary meaning	N/A

II. Terms Allocated to Defendants

Defendants do not believe any claim construction is needed, and that the plain ordinary meaning should apply.

III. Conclusion

The parties respectfully request that the Court construe these terms and phrases in accordance with the briefing schedule established by the Local Patent Rules.

Respectfully Submitted,

/Brandon J. Leavitt/
Brandon James Leavitt
Counsel for Plaintiffs

Agreed as to Form and Substance:

/Bryan Todd/ (by permission)
Bryan Todd
Counsel for Defendants